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Proposed Attorneys for Trustee

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA

* * * * *

IN RE:

Lead Case No.: BK-19-50102-btb
(Chapter 7)

DOUBLE JUMP, INC.

Jointly Administered with:

- ☐ AFFECTS THIS DEBTOR
- ☒ AFFECTS DORA DOG PROPERTIES, LLC
- ☒ AFFECTS DOG BLUE PROPERTIES, LLC
- ☒ AFFECTS BRANDY BOY PROPERTIES, LLC
- ☒ AFFECTS 475 CHANNEL ROAD, LLC
- ☒ AFFECTS PARK ROAD, LLC
- ☒ AFFECTS 140 MASON CIRCLE, LLC
- ☐ AFFECTS DC SOLAR SOLUTIONS, INC.
- ☐ AFFECTS DC SOLAR DISTRIBUTION, INC.
- ☐ AFFECTS DC SOLAR FREEDOM, INC.
- ☐ AFFECTS ALL DEBTORS.

19-50103-btb	Dora Dog Properties, LLC
19-50104-btb	Dog Blue Properties, LLC
19-50105-btb	Brandy Boy Properties, LLC
19-50106-btb	475 Channel Road, LLC
19-50108-btb	Park Road, LLC
19-50109-btb	140 Mason Circle, LLC
19-50130-btb	DC Solar Solutions, Inc.
19-50131-btb	DC Solar Distribution, Inc.
19-50135-btb	DC Solar Freedom, Inc.

**EX PARTE APPLICATION BY
CHAPTER 7 TRUSTEE TO EMPLOY
STEPHEN R. HARRIS, ESQ. AS
TRUSTEE'S ATTORNEY PURSUANT
TO 11 U.S.C. §327(a)**

DATE: N/A
TIME: N/A

1 W. Donald Gieseke, Trustee for the Chapter 7 bankrupt estates of six (6) of ten (10) of the
 2 Jointly Administered Debtors, specifically, DORA DOG PROPERTIES, LLC; DOG BLUE
 3 PROPERTIES, LLC; BRANDY BOY PROPERTIES, LLC; 475 CHANNEL ROAD, LLC;
 4 PARK ROAD, LLC; and 140 MASON CIRCLE, LLC (collectively "Debtors"), respectfully
 5 requests that the Court approve the employment of Stephen R. Harris, Esq. of HARRIS LAW
 6 PRACTICE LLC ("Harris"), as counsel for the Trustee. This APPLICATION ("Application") is
 7 made pursuant to 11 U.S.C. §§327(a) and 328, Federal Rule of Bankruptcy Procedure 2014, and
 8 Section 2 of the United States Trustee Guidelines. This Application is based upon the following
 9 points and authorities, the Declaration of Stephen R. Harris ("Harris Declaration") which has been
 10 filed contemporaneously herewith, and any argument of counsel the Court may wish to entertain
 11 at any hearing to consider the Application, if any.

12 I. JURISDICTION

13 1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334.
 14 This is a core proceeding pursuant to U.S.C. § 157(b). Venue is proper before this Court pursuant
 15 to U.S.C. §§ 1408 and 1409. The statutory predicate for the relief sought herein is 11 U.S.C.
 16 §§327, 328 and 331.

17 II. BACKGROUND

18 2. Debtor DORA DOG PROPERTIES, LLC; Debtor DOG BLUE PROPERTIES,
 19 LLC; Debtor BRANDY BOY PROPERTIES, LLC; Debtor 475 CHANNEL ROAD, LLC;
 20 Debtor PARK ROAD, LLC; and Debtor 140 MASON CIRCLE, LLC, each filed a Chapter 11
 21 Petition on January 30, 2019 ("Petition Date"). On February 12, 2019, this Court entered its Order
 22 jointly administering the ten (10) related Chapter 11 cases, designating Double Jump, Inc. as the
 23 lead case. On March 22, 2019, this Court entered its Order converting the cases to Chapter 7
 24 proceedings, and on March 22, 2019, W. Donald Gieseke was duly appointed as the Chapter 7
 25 trustee ("Trustee") for six (6) of the ten (10) jointly administered cases (Case Nos. 19-50103; 19-
 26 50104; 19-50105; 19-50106; 19-50108; and 19-50109).

27 III. PROPOSED COUNSEL

28 3. The Trustee believes retention of an attorney is necessary to represent him in the

1 following matters:

- 2 a. To continue investigation of financial transactions which occurred prior to or
3 after the bankruptcy filing to determine if assets are recoverable pursuant to 11
4 U.S.C. §§544, 547, 548 or 549;
- 5 b. To assist the Trustee in conducting litigation to recover assets for the estate;
6 and
- 7 c. To assist the Trustee in other matters as directed by the Trustee related to the
8 general administration of the Chapter 7 estate.

- 9 4. 11 U.S.C. §327(a) allows for the Trustee's employment of an attorney as follows:
10 Except as otherwise provided in this section, the trustee,
11 with the court's approval, may employ one or more
12 attorneys, accountants, appraisers, auctioneers, or other
13 professional persons, that do not hold or represent an
14 interest adverse to the estate, and that are disinterested
15 persons, to represent or assist the trustee in carrying out the
16 trustee's duties under this title.

15 5. The Trustee desires to employ Harris for purposes of providing legal counsel as
16 more specifically set forth above. Harris is a full service law firm, with extensive experience in
17 the field of bankruptcy, real estate, litigation and general business matters and is well qualified to
18 represent the Trustee.

19 6. The Trustee shall employ Harris based on time and standard billable charges
20 because of the extensive legal services that may be required in this case. No retainer deposit will
21 be paid to Harris upon his employment.

22 7. It is the firm's policy to charge its clients in all areas of practice for all other
23 expenses incurred in connection with the client's case. The expenses charged to clients include,
24 among other things, facsimile charges, mail and express mail charges, special or hand delivery
25 charges, document retrieval, photocopying charges, charges for mailing supplies (including
26 without limitation, envelopes and labels) provided by the firm to outside copying services for use
27 in mass mailings, travel expenses, expenses for "working meals", computerized research,
28 transcription costs, charges related to conference calls hosted by the firm as well as non-ordinary

1 overhead expenses such as secretarial and other overtime. The firm will charge the Trustee for
2 these expenses in a manner and at rates consistent with charges made generally to the firm's other
3 clients.

4 8. Stephen R. Harris' rate is \$450.00 per hour, and paraprofessional services at
5 \$150.00 to \$250.00 per hour, depending on the paralegals experience and skills. These are usual
6 and customary rates charged by said law firm and compensation is authorized by 11 U.S.C. §§
7 328(a) and 331.

8 9. Harris has indicated his willingness to accept the engagement subject to the terms
9 and conditions set forth herein.

10 10. To the best of the Trustee's knowledge, and as disclosed in the Harris Declaration and
11 below, Harris has no prior connection with the Trustee, the Debtors, their creditors, or any other
12 party-in-interest, or its respective attorneys or accountants in the matters upon which Harris is to
13 be engaged that would disqualify him from representing the Trustee. Harris will apply for Court
14 approval of the legal fees and costs incurred in his representation of the Trustee as an allowed
15 Chapter 7 administrative expense.

16 11. Harris is a "disinterested person" as the Trustee understands this term to be defined
17 within the meaning of Section 101(14) of the Bankruptcy Code.

18 WHEREFORE, the Trustee requests the entry of an Order authorizing Trustee to employ
19 and retain STEPHEN R. HARRIS, ESQ. of HARRIS LAW PRACTICE LLC, as his attorney
20 pursuant to 11 U.S.C. §327(a), and granting such other and further relief as is just and proper.

21 Respectfully submitted this 27th day of March, 2019.

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23 STEPHEN R. HARRIS, ESQ.
HARRIS LAW PRACTICE LLC

24 /s/ Stephen R. Harris

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Proposed Attorneys for Trustee

VERIFICATION

I, W. DONALD GIESEKE, the Chapter 7 Trustee named in the foregoing EX PARTE APPLICATION BY CHAPTER 7 TRUSTEE TO EMPLOY STEPHEN R. HARRIS, ESQ. AS TRUSTEE'S ATTORNEY PURSUANT TO 11 U.S.C. §327(a) hereby swear that the statements therein contained are true according to the best of my knowledge, information, and belief.

/s/ W. Donald Gieseke

W. DONALD GIESEKE
Chapter 7 Trustee